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Sharp Electronics Manufacturing Company of America, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Case No. 07-cv-05944 (SC)

MDL No. 1917

This Document Relates To:

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
No. 13-cv-1173-SC;

Sharp Elecs. Corp. et al. v. Koninklijke Philips
Elecs. N.V. et al., No. 13-cv-2776-SC.

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF
SHARP'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RE: MOTION IN
LIMINE NO. 8**

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am a Partner with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel
3 for Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America,
4 Inc. (collectively, "Sharp"). I am a member of the bars of the State of Maryland, the State of New York,
5 and the District of Columbia, and I am admitted to practice before this court *pro hac vice*.

6 2. I submit this declaration in support of Sharp's Administrative Motion to File Documents
7 Under Seal. I have personal knowledge of the matters set forth herein and, if called as a witness, I could
8 and would testify competently to them.

9 3. Pursuant to Civil Local Rules 7-11 and 79-5, Sharp, by and through counsel, respectfully
10 requests an Order permitting it to file under seal portions of Sharp's Opposition to Joint Defense Motion
11 In Limine No. 8, filed contemporaneously herewith, and Exhibits A-B and E of the Declaration of Craig
12 A. Benson in Support of Sharp's Opposition to Joint Defense Motion In Limine No. 8.

13 4. Attached as Exhibit A is a true and correct copy of relevant excerpts from the deposition
14 transcript of witness Chih Chun-Liu, dated February 20, 2013, designated by Chunghwa as Highly
15 Confidential.

16 5. Attached as Exhibit B is a true and correct copy of relevant excerpts from the deposition
17 transcript of witness Sheng-Jen Yang, dated February 22-26, 2013, designated by Chunghwa as Highly
18 Confidential.

19 6. Attached as Exhibit E are true and correct copies of documents produced at Bates numbers
20 TSA-CRT00039725, TCE-CRT 0020908, TSA-CRT00000793, and TSA-CRT00000689, designated by
21 Thomson as Confidential or Highly Confidential.

22 7. Sharp's Opposition to Joint Defense Motion In Limine No. 8 and Exhibits A-B and E refer to
23 or contain excerpts from documents that parties have designated as "Confidential" or "Highly
24 Confidential" under the Stipulated Protective Order [Docket Nos. 306, 1142].

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1 8. Accordingly, Sharp requests that the documents identified herein be filed under seal.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct.

4 Executed this 27th day of February, 2015, in Washington, DC.

5 /s/ Craig A. Benson

6 Craig A. Benson
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